

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

OCT 10 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS",

Defendant.

**4:18CR840 JAR/NAB**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about October 12, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS,"**

the defendant herein, knowingly and by means and use of a deadly and dangerous weapon, that is, a firearm, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Section 1114 of Title 18, United States Code, to wit: Archie Shaw, a Federal Bureau of Investigation Special Federal Officer, while Special Federal Officer Archie Shaw was engaged in his official duties which resulted in bodily injury to Special Federal Officer Archie Shaw.

All in violation of Title 18, United States Code, Sections 111(a)(1) and (b).

**COUNT TWO**

The Grand Jury further charges that:

On or about October 12, 2017, in the City of Saint Louis, Missouri, within the Eastern District of Missouri,

**JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS,"**

the defendant herein, did knowingly possess, brandish and discharge one or more firearms in furtherance of a crime of violence which may be prosecuted in a court of the United States; to wit: assaulting a federal law enforcement officer with a deadly weapon as charged in Count One herein,

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT THREE**

The Grand Jury further charges that:

On or about October 12, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS,"**

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly and intentionally possess ammunition which traveled in interstate or foreign commerce prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

The Grand Jury further charges that:

On or about October 14, 2017, in the City of Saint Louis, within the Eastern District of Missouri,

**JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS,"**

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly and intentionally possess one or more firearms to wit: a Taurus make, PT111 G2 model, nine millimeter semi-automatic pistol bearing serial number TJY96629, which traveled in interstate or foreign commerce prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIVE**

The Grand Jury further charges that:

Beginning on a date unknown to the grand jury, but including on or about October 14, 2017, and continuing up to on or about August 6, 2018, within the Eastern District of Missouri,

**JOHNZELL MOOREHEAD,  
a/k/a "MEMPHIS,"**

the defendant herein, did knowingly attempt to corruptly persuade GINA OUTLAW by writing and mailing one or more letters in which defendant directed GINA OUTLAW to make false statements that she, among other things:

"doesn't know s--t;"

"the police scared [OUTLAW];"

"said the first name that came to [her] head [because] that's what the street said;"

"was highly medicad (sic) on [her] meds;"

"wasn't there to see s--t;"

"go into the grand jury and tell them you don't know what happen (sic) tell the people that the police scared you, & said they was gone take your kids away from you. Tell them you be highly medicated & you do Zans (sic) this will make them throw your statement out"

"not cooperating with them"

"lied"

"In the paragraph that you write I really want you to stress that I was never in that damn Crown Vic...I have 'NEVER' been in that damn car 'EVER;'"

and, in relation to the letter dated December 3, 2017, to "read, remember, listen; rip up & throw it away; right away,"

with the intent to influence the testimony of GINA OUTLAW in an official proceeding, *In re:*

*United States of America v. Johnzell Moorehead, et al.*, United States Attorney's

Office for the Eastern District of Missouri Number 2017R00951.

In violation of Title 18, United States Code, Section 1512(b)(1).

A TRUE BILL.

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FOREPERSON

JOHN E. CHILDRESS  
Attorney for the United States  
Acting Under Authority Conferred by 28 U.S.C. § 515

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THOMAS REA, #53245MO  
Assistant United States Attorney